

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-PP

**SECOND DECLARATION OF
MOIRA DEMOS**

I, Moira Demos, hereby swear as follows:

1. I am over 18 years old and have personal knowledge regarding the facts set forth in this Declaration. If called to testify, I could and would testify competently regarding the facts recited herein.
2. I share a residence with Laura Ricciardi in Los Angeles, California.
3. Our residence is not in a gated community. It is on a public, residential street that is not blocked to either vehicle or foot traffic by gates, fences, walls or other obstacles.
4. Our house sits above the grade of the street and sidewalk. As a result, there is a retaining wall and fence at the front perimeter of our property that includes a gate at the bottom of the stairs that lead to our front door. There is an intercom adjacent to the gate through which visitors let us know that they are there.
5. Chrome Media LLC, the documentary film production company that Ms. Ricciardi and I own and operate, does not maintain offices at 15821 Ventura Blvd. in Encino, California. That is the business address of Tal Benari, who Chrome Media has designated as its registered

agent for service of process in California. Chrome Media has never conducted business from that address and neither Ms. Ricciardi nor I have ever occupied offices there.

6. Mr. Benari is not and has never been an officer, director, managing agent or employee of Chrome Media. He has never exercised any authority, control, supervision or discretion over the business affairs of Chrome Media or played any role in its management.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

FURTHER YOUR DECLARANT SAYETH NOT.

Dated: June 12, 2019



Moira Demos